



POINT LOMA NAZARENE COLLEGE

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Department of Communication Studies
March 16, 1998

Chairman William Kennard
Federal Communications Commission
1919 M Street N.W.
Washington DC 20554

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Docket # 99-25

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Federal Communications Commission
Office of Secretary

Dear Chairman Kennard:

I am writing to address the issue of low power radio stations as recently reported in USA Today and Broadcasting and Cable. Since I do not have the current petition on the matter, consider this more an informational statement and point of view, than a specific response.

Most of the trade press coverage of this matter revolves around the FCC goals of diversity and confronting the problem of pirate broadcasting. My perspective is different, yet I believe a valid one to bolster the case in favor of low wattage radio. As a professor of communication, I have lived in the worlds of academia and professional broadcasting. My first real training in broadcasting came at a 10 watt educational station at a liberal arts college in the Midwest. This is a fond memory, for not only did it teach me to think as a licensed broadcaster, responsible for communicating in the public interest, but I was able to hone my professional skills in an environment where the audience was real but the commercial stakes were not high.

Unfortunately, as a teacher I have not been able to replicate that experience for my students and among the many factors contributing to this problem is the technical realization that our broadcast technologies are inferior. Like hundreds of other colleges nationwide, the only practical alternative is carrier current, which is marginal at best in terms of quality and often unreliable. Even when the signals work, we have an extremely difficult time teaching such things as engineering requirements, FCC regulations and the public interest standard, because there are few "real world" applications of the principles in the student's radio laboratory.

I support this proposal because it can conceivably return us to a time when educational institutions are licensed to use spectrum without the cost and allocation barriers that presently lock us out of the marketplace. In two of my teaching assignments, I have been in small colleges located in large cities. The educational spectrum was never available to us to even consider a licensed operation. These are the kinds of colleges that produce quality broadcasters, but the FCC's move away from low wattage many years ago prevents us from giving students the full range of training, and the inferior quality of the alternative technologies continually sets us up for small audiences, poor sound and low morale in the program.

I know there are many voices you will hear on this issue, and the commercial broadcasters will once again see any expansion of spectrum as a threat. True diversity is a concept that goes to many levels of society, and I hope these comments suggest that the educators of tomorrow's broadcasters also have a vital stake in opening up the public airwaves.

Sincerely,

Randall E. King
Randall E. King

Assistant Professor of Communication Studies

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